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20 **UNITED STATES DISTRICT COURT**  
21 **DISTRICT OF NEVADA**

22 SUNNY COCKERLINE,

23 Plaintiff,

24 v.

25 TRANS UNION, LLC; EQUIFAX  
26 INFORMATION SERVICES, LLC;  
27 EXPERIAN INFORMATION SOLUTIONS,  
28 INC.; and PORTFOLIO RECOVERY  
ASSOCIATES, LLC;

Defendants.

Case No.: 2:22-cv-01332-MMD-EJY

**PLAINTIFF'S MOTION TO EXTEND  
TIME FOR DEFENDANT TRANS  
UNION, LLC TO RESPOND TO INITIAL  
COMPLAINT**

1 Plaintiff Sunny Cockerline (“Plaintiff”) hereby files her Unopposed Motion for  
2 Extension of Time for TransUnion to Answer (“Motion”) and in support states:

3 1. TransUnion’s responsive pleading is due on September 9, 2022.

4 2. Plaintiff and TransUnion are actively engaged in case-resolution negotiations.

5 3. Plaintiff does not oppose an extension of TransUnion’s time to Answer the  
6 Complaint so that the parties may devote their energies to resolving this matter. Plaintiff files  
7 this Motion consistent with its agreement with TransUnion and further files this Motion  
8 respectfully requesting the Court for an extension of time to file its responsive pleading for 30  
9 days, to October 11, 2022.  
10

11 4. The Motion is not for delay.

12 5. This is TransUnion’s first extension of time and the requested extension does not  
13 prejudice the parties.  
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6. For the foregoing reasons, Plaintiff requests that the Court issue an order extending the date, to October 11, 2022, on which TransUnion must answer or otherwise respond to Plaintiff's Complaint.

Respectfully submitted,

## KIND LAW

/s/ Michael Kind

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/s/ George Haines

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*Counsel for Plaintiff Sunny Cockerline*

IT IS SO ORDERED:

Raymond J. Zouchak  
United States Magistrate Judge

United States Magistrate Judge

DATED: September 9, 2022